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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91225152
Party	Plaintiff Jennifer Macaluso
Correspondence Address	RON LAZEBNIK LINCOLN SQUARE LEGAL SERVICES INC 150 WEST 62ND STREET , 9TH FLOOR NEW YORK, NY 10023 UNITED STATES rlazebnik@lsls.fordham.edu
Submission	Answer to Counterclaim
Filer's Name	Ron Lazebnik
Filer's e-mail	rlazebnik@lsls.fordham.edu
Signature	/Ron Lazebnik/
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Jennifer Macaluso,

Opposer/Counterclaim-Defendant,

v.

Lesilu Productions, Inc.,

Applicant/Counterclaim-Plaintiff.

Opposition No.: 91225152

Application Serial. No.: 86353585

Mark: HEY DOLL

ANSWER TO COUNTERCLAIM PETITION FOR CANCELLATION

Jennifer Macaluso ("Registrant") for her answer to the Counterclaim Petition for Cancellation ("Petition") filed by Lesilu Productions, Inc. ("Petitioner") against Ms. Macaluso's registration of HEY, DOLLFACE!, Registration No. 4380027, pleads and avers as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations contained in Paragraph 1 of the Petition.
2. Denies knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations contained in Paragraph 2 of the Petition.
3. Admits the allegations contained in Paragraph 3 of the Petition.
4. Admits the allegations contained in Paragraph 4 of the Petition.
5. Admits the allegations contained in Paragraph 5 of the Petition.
6. Admits the allegations contained in Paragraph 6 of the Petition.
7. Admits the allegations contained in the first sentence in Paragraph 7 of the Petition, and denies the allegations in the second sentence in Paragraph 7 of the Petition, except to the extent they contain legal conclusions to which no response is required.
8. Denies knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in Paragraph 8, except to the extent they contain legal conclusions to which no response is required.

9. Denies the allegations in Paragraph 9 of the Petition, except to the extent they contain legal conclusions to which no response is required.
10. Denies the allegations in Paragraph 10 of the Petition.
11. Admits the allegation in Paragraph 11 of the Petition that the Petition for Cancellation was submitted, and denies knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations contained in Paragraph 11 of the Petition.

First Affirmative Defense

12. The Petition fails to state a claim upon which relief can be granted.

Second Affirmative Defense

13. Upon information and belief, Petitioner has not used the mark HEY DOLL in commerce (as the term is defined in 15 U.S.C. § 1127) for the goods described in Paragraph 1 of the Petition, prior to Registrant's use of Registrant's mark in commerce for the goods identified in Registration No. 4380027.

WHEREFORE, Registrant requests that the Trademark Trial and Appeal Board dismiss the Counterclaim Petition for Cancellation and grant all other appropriate relief to Registrant it deems just.

Dated: February 2, 2016
New York, New York

Respectfully submitted,

LINCOLN SQUARE LEGAL SERVICES, INC.

By: 
Ron Lazebnik

150 West 62nd Street, 9th Floor
New York, NY 10023
(212) 636-6934
rlazebnik@lsls.fordham.edu

Attorneys for Jennifer Macaluso

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **ANSWER TO COUNTERCLAIM
PETITION FOR CANCELLATION** was served by first class mail on February 2, 2016, upon
the following:

Lawrence D. Mandel
GERTNER MANDEL & PESLAK LLC
P.O. Box 499
Lakewood, NJ 08701



Ron Lazebnik